

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE §  
KINGREY, and SANDRA McCOLLUM, §  
individually and as heirs at law to the Estate of §  
LARRY GENE McCOLLUM, §  
PLAINTIFFS §

v. §

CIVIL ACTION NO.  
3:12-cv-02037

BRAD LIVINGSTON, JEFF PRINGLE, §  
RICHARD CLARK, KAREN TATE, §  
SANDREA SANDERS, ROBERT EASON, the §  
UNIVERSITY OF TEXAS MEDICAL §  
BRANCH and the TEXAS DEPARTMENT OF §  
CRIMINAL JUSTICE. §  
DEFENDANTS §

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND TIME**

Plaintiffs respectfully ask the Court to extend the deadline to respond to Defendant University of Texas Medical Branch's Motion to Dismiss Under Federal Rule of Civil Procedure 12(c) (Doc. 55) filed on May 30, 2013.

Pursuant to Local Rule CV-7.1(e), Plaintiff's response to the Motion to Dismiss is due June 20, 2013.

Plaintiffs requests the response deadline be extended to June 28, 2013.

Plaintiffs' lead counsel will be in San Francisco meeting with co-counsel and for a hearing from June 20 to June 21 in *Opperman et. al. v. Path et. al*, a putative class action, and requests additional time to respond to the motion.

Pursuant to this Court's order of February 5, 2013, this case is not set for trial until February 2014 and the deadline for dispositive motions is not until September 16, 2013. This, granting this motion will not delay any proceedings.

Plaintiffs have contacted Defendants' counsel and they are unopposed to this short extension of time.

As the request is made for good cause and not to cause delay, Plaintiffs respectfully request that the Court grant Plaintiffs' motion and extend their deadline to respond to June 28, 2013.

Dated: June 18, 2013.

Respectfully submitted,

The Edwards Law Firm  
The Bremond Houston House  
706 Guadalupe  
Austin, Texas 78701  
Tel. 512-623-7727  
Fax. 512-623-7729

By /s/ Scott Medlock

JEFF EDWARDS  
State Bar No. 24014406  
Lead Counsel

Scott Medlock  
State Bar No. 24044783  
Brian McGiverin  
State Bar No. 24067760  
James C. Harrington  
State Bar No. 09048500

TEXAS CIVIL RIGHTS PROJECT  
1405 Montopolis Drive  
Austin, TX 78741  
(512) 474-5073 [phone]  
(512) 474-0726 [fax]

Eliot Shavin  
State Bar No. 18138200  
2600 State Street  
Dallas, Texas 75204

214-522-2010 (telephone)

214-720-9594 (fax)

Local Counsel

ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Northern District of Texas.

**CERTIFICATE OF CONFERENCE**

By my signature above, I certify I conferred with counsel for UTMB, Kim Coogan, via email and she is unopposed to this motion.

**CERTIFICATE OF CONFERENCE**

By my signature above, I certify I conferred with counsel for the Defendants, Bruce Garcia, and he is unopposed to this motion.